



# **Air Quality Permitting Statement of Basis**

**May 17, 2005**

**Tier I Operating Permit Renewal No. T1-040040**

**Western World, Incorporated, Circle J Trailers; Caldwell, Idaho**

**Facility ID No. 027-00064**

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**DRAFT FOR PUBLIC COMMENT**

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## Acronyms, Units, and Chemical Nomenclatures

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
BACT	Best Available Control Technology
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HAPs	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
MACT	Maximum Achievable Control Technology
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
Rules	Rules for the Control of Air Pollution in Idaho
SIP	State Implementation Plan
SO <sub>2</sub>	sulfur dioxide
VOC	volatile organic compound

## **1. PURPOSE**

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.362, Rules for the Control of Air Pollution in Idaho, for issuing Tier I operating permits.

## **2. FACILITY DESCRIPTION**

Western World, Inc. Circle J Trailers (Western World) manufactures horse and utility trailers. Processes include welding, priming and painting, composite fiberglass lay-up. Western World was issued its initial Tier I operating permit on December 15, 2000 – Tier I Operating Permit No. 027-00067. Western World has certified that the facility has not been modified during the term of its initial Tier I operating permit.

## **3. FACILITY / AREA CLASSIFICATION**

Please defer to the technical memorandum developed for Tier I Operating Permit No. 027-00067, issued December 15, 2000.

The AIRS information provided in Section 9 of this statement of basis defines the classification for each regulated air pollutant at Western World. This required information is entered into the EPA AIRS database.

## **4. APPLICATION SCOPE**

Western World has submitted an application to renew its Tier I operating permit. Western World has certified that the facility has not been modified during the term of its initial Tier I operating permit.

### **4.1 *Application Chronology***

October 12, 2004	DEQ received a Tier I operating permit renewal application from Western World
December 10, 2004	DEQ declared application incomplete
January 18, 2005	DEQ received updated information from Western World
March 18, 2005	DEQ declared the application complete

## **5. PERMIT ANALYSIS**

Please defer to the technical memorandum developed for Tier I Operating Permit No. 027-00067, issued December 15, 2000.

### **5.1 *Emissions Inventory***

Please defer to the technical memorandum developed for Tier I Operating Permit No. 027-00067, issued December 15, 2000.

### **5.2 *Modeling***

Modeling is not required for Tier I operating permits.

### 5.3 Regulatory Review

Please defer to the technical memorandum developed for Tier I Operating Permit No. 027-00067, issued December 15, 2000.

### 5.4 Fee Review

Western World is a major facility as defined in IDAPA 58.01.01.008.10, and is therefore subject to registration and registration fees in accordance with IDAPA 58.01.01.387. The facility is current with its registration fees.

## 6. PERMIT CONDITIONS

There are no changes to the permit conditions for Building #2 and Building #3 except for numbering due to new formatting. Table 6.1 provides the cross reference between the renewal and the Tier I operating permit issued December 15, 2000. With the use of standard facility wide conditions and general provisions, there are minor differences between the renewal and the Tier I operating permit issued December 15, 2000 for the facility wide conditions and the general provisions. They are listed in the following:

Table 6.1 PERMIT NUMBERING CROSS REFERENCE

Permit Numbering in Tier I operating permit Issued December 15, 2000	Permit Numbering in the Renewal	Permit Numbering in Tier I operating permit Issued December 15, 2000	Permit Numbering in the Renewal	Permit Numbering in Tier I operating permit Issued December 15, 2000	Permit Numbering in the Renewal
A.1	2.1	A.14	2.16	C.2	4.2
A.2	2.2	A.15	2.10	C.3	4.11
A.3	2.3	A.16	2.13	C.4	4.5
A.4	2.4	A.17	2.17	C.5	4.10
A.5	2.5	A.18	2.18	C.6	4.6
A.6	2.6	B.1	3.2	C.7	4.7
A.7	2.7	B.2	3.2	C.8	4.3
A.8	2.8	B.3	3.6	C.9	4.8
A.9	2.9	B.4	3.3	C.10	4.12
A.10	2.12	B.5	3.7	C.11	4.4
A.11	2.11	B.6	3.4	C.12	4.9
A.12	2.14	B.7	3.5		
A.13	2.15	C.1	4.1		

### Facility –Wide Condition

- 6.1 To be consistent with current standard facility wide conditions, “*Unless specified elsewhere in this permit,*” is deleted from Permit Condition A.3, A.4 and A.9; “*Federally enforceable; however, this provision will become state-only enforceable upon removal from the SIP*” is deleted from the citation of Permit Condition A.5; Permit Condition A.8 is reworded; “*Department*” is replaced with “*DEQ*”; “*log*” in Permit Condition A.9.5.1 is replaced with “*record*”; Permit Conditions A.14 and A.15 has been reworded; permit conditions are renumbered.

## General Provisions

- 6.2** To be consistent with current standard general provisions, the effective date of the regulation is added to the citation for each permit condition; “*Section 213 is a State Only requirement, but has been submitted to EPA for federal approval*” is removed from the citation of General Provisions No.10; General Provisions No.16 about fees is revised as “*The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.397.*”; a specified reporting period of “*from November 1 to October 31*” is added to General Provisions No.21.1; Specified reporting periods of “*from November 1 to April 30*” and “*from May 1 to October 31*” are added to General Provisions No.24; General Provisions conditions are renumbered.

## 7. PUBLIC COMMENT

In accordance with IDAPA 58.01.01.364, the draft Tier I operating permit renewal will be provided for public notice, public comment, and affected states review. The state of Oregon is an affected state, and as such, will be provided a copy of the Tier I renewal application, and the draft permit and statement of basis for review and comment.

## 8. RECOMMENDATION

Based on review of application materials and all applicable state and federal rules and regulations, staff recommends that draft Tier I Operating Permit No. T1-040040 be provided for public comment and affected states review as required by IDAPA 58.01.01.364.

## 9. AIRS

**Table 9.1 AIRS/AFS<sup>a</sup> FACILITY-WIDE CLASSIFICATION<sup>b</sup> DATA ENTRY FORM**

AIR PROGRAM	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	TITLE V	AREA CLASSIFICATION A – Attainment U – Unclassifiable N – Nonattainment
POLLUTANT							
SO <sub>2</sub>	B						U
NO <sub>x</sub>	B						U
CO	B						U
PM <sub>10</sub>	B						U
PT (Particulate)	B						
VOC	A					A	U
THAP (Total HAPs)	B						
			APPLICABLE SUBPART				

<sup>a</sup> Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

<sup>b</sup> AIRS/AFS Classification Codes:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For NESHAP only, class “A” is applied to each pollutant which is below the 10 T/yr threshold, but which contributes to a plant total in excess of 25 T/yr of all NESHAP pollutants.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).